

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Ruth Ann Kwan

1 MICHAEL N. FEUER, City Attorney, SBN 111529
ARTURO MARTINEZ,
2 Deputy Chief, Safe Neighborhoods & Gang Division, SBN 180355
JONATHAN CRISTALL,
3 Supervising Assistant City Attorney, SBN 191935
LIORA FORMAN-ECHOLS,
4 Assistant Superv. Deputy City Attorney, SBN 184135
MARIA AGUILLON, Deputy City Attorney, SBN 199851
5 200 N. Main Street, Suite 966, Los Angeles, California 90012
Telephone: 213.978.4090 / Fax: 213.978.4670
6 E-Mail: Maria.Aguillon@lacity.org

7 Attorneys for Plaintiff

NO FEE – GOV'T CODE § 6103

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No.:

12 Plaintiff,

**COMPLAINT FOR ABATEMENT AND
INJUNCTION**

13 vs.

14 DORION ORLANDO MURRAY, as an individual
and as trustee of THE ALBERT AND DELORES
15 MURRAY FAMILY TRUST DATED JULY 18, 1996
and THE REVOCABLE LIVING TRUST OF
16 ALBERT J. MURRAY; and DOES 1 through 25,
inclusive,

[Health and Safety Code section 11570,
et seq.; Civil Code section 3479, et seq.]

(Unlimited Action)

17 Defendants.
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23 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

24 **I. INTRODUCTION**

25 1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the
26 State of California ("People"), for the purpose of abating an ongoing public nuisance which
27 exists at a duplex located at 1241-1243 Meadowbrook in the Miracle Mile area of Los
28 Angeles ("Property") in the Los Angeles Police Department's ("LAPD") Wilshire Division.

1 The Action is brought pursuant to the Narcotics Abatement Law, California Health and
2 Safety Code section 11570, *et seq.* ("NAL") and the Public Nuisance Law, Civil Code
3 sections 3479-3480 ("PNL").

4 2. Plaintiff is filing this lawsuit in an effort to address unlawful nuisance activity,
5 including narcotics sales, occurring at and related to the Property. Defendant DORIAN
6 ORLANDO MURRAY ("Defendant MURRAY"), a 52-year-old male, is a resident and the
7 person in control of the Property. Defendant MURRAY has an extensive criminal
8 background, which includes felony narcotics, violence and firearm-related convictions.
9 Now, a recent LAPD investigation reveals that Defendant MURRAY, on an ongoing basis,
10 sells methamphetamine and cocaine base at the Property and uses the Property to store
11 narcotics, creating a public nuisance that affects the entire surrounding area. More
12 specifically, since at least December 5, 2017, Defendant MURRAY has been convicted at
13 least twice for narcotics sales crimes at the Property. Most recently, on March 3, 2019,
14 during a probation check of Defendant MURRAY at the Property, LAPD officers recovered
15 numerous bindles of methamphetamine and cocaine base, individually packaged for sales
16 and \$1880 in cash on Defendant MURRAY's person. Defendant MURRAY was
17 subsequently convicted of possession of a controlled substance for sale (in violation of
18 Health & Safety Code section 11351.5) and is currently on formal probation for both cases
19 as a result.

20 3. Defendant MURRAY's parents, Albert John Murray and Delores Marie
21 Murray, originally owned the Property. In 1996, they transferred title to the Property to The
22 Albert and Delores Murray Family Trust dated July 18, 1996 ("1996 Trust"). On March 31,
23 2010, Dolores Marie Murray died at the age of 83. Thereafter, from an unknown time, but
24 at least from about July 29, 2010, Defendant MURRAY moved into the Property with his
25 father, where he continues to reside even after his father's 2016 death, with various other
26 unknown and/or unidentified individuals. Prior to his death in 2016, Albert John Murray
27 transferred title to three real properties, including the Property, seemingly disposing of his
28 assets. In 2016, Defendant MURRAY attempted to undermine his father's earlier wishes

1 for his benefit and sued to unwind the three real property transfers. As a result, ownership
2 of the Property is currently part of a vigorous multi-case litigation battle among Albert's
3 heirs, as explained in Section II.D., below.

4 4. The narcotics activity and general nuisance at the Property has not only
5 significantly affected the quality of life and the quiet enjoyment of property, but it has also
6 taxed scarce police resources by necessitating a disproportionate amount of LAPD
7 attention. The People bring this Action to obtain an injunction and other relief that will
8 prevent the narcotics nuisance at the Property and require Defendant MURRAY and all
9 others living or visiting the Property to take steps to bring the unacceptable state of affairs
10 at the Property to a halt.

11 II. THE PARTIES AND THE PROPERTY

12 A. Plaintiff

13 5. Plaintiff, the People, is the sovereign power of the State of California
14 designated in Health and Safety Code section 11571, and Code of Civil Procedure section
15 731 to be the complaining party in law enforcement actions brought to abate, enjoin and
16 penalize narcotics nuisances and public nuisances, respectively.

17 B. Defendant

18 6. Defendant MURRAY, a self admitted School Yard Crip gang member with the
19 moniker of "Fat Cat", is a resident of the Property and is currently disputing the ownership
20 of the Property, as further detailed below. Defendant MURRAY asserts that he is the
21 successor trustee of 1996 Trust, and a subsequently created trust, The Revocable Living
22 Trust of Albert J. Murray dated April 21, 2011 ("2011 Trust") (collectively "Trusts").¹
23 Defendant MURRAY has occupied, controlled and/or operated the Property, and/or has
24 acted as the owner and occupier of the Property.

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26
27 ¹ Plaintiff sues Defendant MURRAY in his capacity as trustee of the Trusts out of an abundance of
28 caution since this issue has not yet been adjudicated by the Court. However, Plaintiff's
identification of Defendant MURRAY as trustee of the Trusts here should not be interpreted as
supporting any of Defendant MURRAY's claims or contentions in other litigation.

1 7. Defendant MURRAY has an extensive criminal background with multiple
2 felony and misdemeanor convictions. In March 2019, Defendant MURRAY was convicted
3 of possession of a controlled substance for sale (in violation of Health & Safety Code
4 section 11351.5) after LAPD officers conducted a probation search at the Property and
5 recovered multiple bindles of methamphetamine and cocaine base individually wrapped for
6 sales. In December 2017, Defendant MURRAY was convicted of narcotics sales (in
7 violation of Health & Safety Code section 11379(a)) after he sold methamphetamine to an
8 informant and officers recovered additional methamphetamine and \$1,195 in cash at the
9 Property. In addition to these convictions, Defendant MURRAY's criminal history also
10 includes several convictions for felonies and misdemeanors, including robbery, battery, and
11 firearm related crimes.

12 8. The true names and capacities of Defendants sued herein as DOES 1
13 through 25, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such
14 fictitious names. When the true names and capacities of said Defendants have been
15 ascertained, Plaintiff will ask leave of the Court to amend this Complaint and to insert in lieu
16 of such fictitious names the true names and capacities of said fictitiously named
17 Defendants.

18 **C. The Property**

19 9. The Property is located at the commonly-known address of 1241 and 1243
20 Meadowbrook Avenue, Los Angeles, California 90019, in the Miracle Mile neighborhood of
21 Los Angeles, California 90019. The Property's legal description is, "Lot 476 in Tract No.
22 5069, as per Map recorded in book 56, pages 82-85 of Maps, in the Office of the County
23 Recorder of said County. Commonly Known As: 1241 and 1243 Meadowbrook Avenue,
24 Los Angeles, CA 90019." Assessor's Parcel Number: 5084-032-008.

25 10. The Property, which is situated in a residential neighborhood, consists of a
26 two-story duplex situated on the west side of Meadowbrook Avenue, one structure north of
27 San Vicente Boulevard. Defendant MURRAY resides in unit 1241. Plaintiff is informed and
28 believes that Defendant MURRAY has custody and control of unit 1243 and allows his adult

son, Dorian N. Murray, or other family and friends to reside there.

D. Pending Litigation Regarding Property Ownership

11. The ownership interests of the Property and of two other properties in Compton, California are currently being litigated by Albert John Murray's heirs in three widely contested court proceedings, as explained below.

12. On December 12, 2012, Albert John Murray, as trustee of the 1996 Trust, transferred title to the Property to his grandson, Rashaad Lamar Gilbert, his daughter's (Brenda Gilbert) son. Brenda is Defendant MURRAY's sole sibling. Thereafter, in March 2013, Albert John Murray also transferred title of two other real properties in Compton; one to his daughter, Brenda, and the other, to two of Defendant MURRAY's children.

13. In 2015, Defendant MURRAY alleging to be trustee of the Trusts, transferred title to the Property to himself, via a corporation he controls. Thereafter, on April 6, 2016, Rashaad Lamar Gilbert (the original Property owner's grandson and Defendant MURRAY's nephew) sued Defendant MURRAY and his corporation to quiet title of the Property (Los Angeles Superior Court ("LASC") Case No. BC616115).

14. On May 16, 2016, Defendant MURRAY, asserting to be the successor trustee of the Trusts, filed a petition in probate court for the return of the Property and the two Compton properties previously transferred by Albert John Murray to the Trusts, pursuant to California Probate Code section 17200(a) (LASC Case No. 16STPB00401).²

15. After Albert John Murray's death, at 94-years of age, Defendant MURRAY filed a petition for letters of administration and moved to probate the will of decedent Albert John Murray (LASC Case No. 17STPB04406).

16. In these cases, Defendant MURRAY asserts, in part, that the 1996 Trust was amended making him the trustee and a beneficiary of the Trusts.³ In addition, he contends that the three real properties, which were transferred by decedent Albert John Murray,

² Albert John Murray, who was 93-years old at the time, was also a named plaintiff in this litigation, but Defendant MURRAY appeared to be the person driving the litigation.

³ Albert John Murray purportedly amended the Trusts several times.

1 actually belong to the Trusts and that their transfer should be rescinded because decedent
2 Albert John Murray was tricked by relatives into transferring title of these properties.

3 17. Conversely, these relatives contend, in part, that subsequent amendment(s)
4 to the Trusts were procured by fraud or undue influence by Defendant MURRAY.

5 18. The litigation in these three underlying cases is ongoing, with the ownership
6 of the three real properties hanging in the balance and millions at stake. The Property
7 alone is owned outright and valued at approximately one and a half million dollars.

8 III. NARCOTICS ABATEMENT LAW

9 19. The abatement of a nuisance is a long established and well-recognized
10 exercise of the state's police power. (*People v. Barbieri* (1917) 33 Cal.App. 770, 775;
11 *People ex rel. Hicks v. Sarong Gals* (1974) 42 Cal.App.3d 556, 563.) Since its enactment
12 in 1972, the principal purpose of the NAL (Health & Saf. Code, § 11570, et seq.) is the
13 abatement of buildings and places "used for the purpose of unlawfully selling, serving,
14 storing, keeping, manufacturing, or giving away any controlled substance, precursor, or
15 analog specified in this division" (Health & Saf. Code, § 11570).

16 20. The NAL provides that every building or place used for the purpose of
17 unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled
18 substance, precursor, or analog *inter alia*, "is a nuisance which **shall** be enjoined, abated,
19 and prevented . . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570
20 [emphasis added]; *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew*
21 *v. Superior Court* (1993) 20 Cal.App.4th 866, 870-871.)

22 21. Health and Safety Code section 11571 authorizes a city attorney to bring an
23 action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part:
24 "Whenever there is reason to believe that a nuisance as described in Section 11570 is
25 kept, maintained, or exists in any county, the district attorney of the county, or the city
26 attorney of any incorporated city or of any city and county, in the name of the people, may .
27 . . maintain an action to abate and prevent the nuisance and perpetually to enjoin the
28 person conducting or maintaining it, and the owner, lessee, or agent of the building or place

1 in or upon which the nuisance exists from directly or indirectly maintaining or permitting the
2 nuisance.”

3 22. Health and Safety Code section 11573(a) provides that: “If the existence of
4 the nuisance is shown in the action to the satisfaction of the court or judge, either by
5 verified complaint or affidavit, the court or judge **shall** allow a temporary restraining order or
6 injunction to abate and prevent the continuance or recurrence of the nuisance.” (Emphasis
7 added.) In addition, Health and Safety Code section 11581 provides, as an additional
8 remedy, for the removal and sale of all fixtures and movable property on the premises used
9 in aiding or abetting the nuisance and for the closure of the building for up to one year.

10 IV. THE PUBLIC NUISANCE LAW

11 23. Civil Code section 3479 defines a public nuisance as “[a]nything which is
12 injurious to health, including, but not limited to, the illegal sale of controlled substances, or
13 is indecent or offensive to the senses, or an obstruction to the free use of property, so as to
14 interfere with the comfortable enjoyment of life or property....” (See *City of Bakersfield v.*
15 *Miller* (1966) 64 Cal.2d 93, 99 [“The Legislature has defined in general terms the word
16 ‘nuisance’ in Civil Code section 3479. . . .”].)

17 24. Civil Code section 3480 defines a public nuisance as “one which affects at the
18 same time an entire community or neighborhood, or any considerable number of persons,
19 although the extent of the annoyance or damage inflicted upon individuals may be
20 unequal.”

21 25. In particular, drug dealing, loitering, consumption of illegal drugs, and
22 boisterous conduct which creates a hooligan-like “atmosphere” constitutes a public
23 nuisance. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.

24 26. Civil Code section 3491 provides that the “remedies against a public nuisance
25 are indictment or information, a civil action or abatement.” Abatement is “accomplished by
26 a court of equity by means of an injunction proper and suitable to the facts of each case.”
27 (*Sullivan v. Royer* (1887) 72 Cal. 248, 249.)

28 27. Code of Civil Procedure section 731 authorizes a city attorney to bring an

1 action to enjoin or abate a public nuisance. It provides in relevant part “[a] civil action may
2 be brought in the name of the people of the State of California to abate a public nuisance
3 . . . by the city attorney of any town or city in which such nuisance exists.”

4 28. Where “a building or other property is so used as to make it a nuisance under
5 the statute, the nuisance may be abated . . . , notwithstanding that the owner had no
6 knowledge that it was used for the unlawful purpose constituting a nuisance.” (*People ex*
7 *rel. Bradford v. Barbieri* (1917) 33 Cal.App. 770, 779; *see also Sturges v. Charles L.*
8 *Harney, Inc.* (1958) 165 Cal.App.2d 306, 318 [“a nuisance and liability therefore may exist
9 without negligence”]; *People v. McCadden* (1920) 48 Cal.App. 790, 792 [“A judgment
10 supported on findings that such nuisance was conducted and maintained on the premises
11 in question, regardless of the knowledge of the owner thereof, is sufficient. Such
12 knowledge on the part of the owner . . . is unnecessary.”]; *People v. Peterson* (1920) 45
13 Cal.App. 457, 460 [“[I]t was not necessary . . . for the trial court to find either, that the
14 [defendants] threatened, and unless restrained, would continue to maintain, aid, and abet,
15 the nuisance, or that they knew the building was used in violation of the act. . . . The
16 existence of the nuisance was the ultimate fact in this case, and having been found,
17 supports the judgment.”].) This is because “the object of the act is not to punish; its
18 purpose is to effect a reformation of the property itself.” (*People v. Bayside Land Co.*
19 (1920) 48 Cal.App. 257, 261.)

20 **FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

21 **[Health and Safety Code Section 11570, *et seq.* --**

22 **Against Defendant DORION ORLANDO MURRAY and DOES 1 through 25]**

23 29. Plaintiff incorporates paragraphs 1 through 28 above as if fully alleged herein.

24 30. Since at least 2015, the Property has been, and is *currently* being used for
25 the purposes of unlawfully selling, serving, storing, keeping, manufacturing or giving away
26 controlled substances in violation of Health and Safety Code section 11570, *et seq.* The
27 general reputation of the Property in the community and amongst law enforcement is that it
28 is a location where the sale of methamphetamine and cocaine base takes place on a

1 regular basis by Defendant MURRAY.

2 31. Defendant MURRAY and DOES 1 through 25, are responsible for conducting,
3 maintaining, and/or directly or indirectly permitting the nuisance as alleged herein. Plaintiff
4 has no plain, speedy and adequate remedy at law, and unless Defendant MURRAY, and
5 DOES 1 through 25, are restrained and enjoined by order of this Court, they will continue to
6 use, occupy and maintain, and/or to aid, abet or permit, directly or indirectly, the use,
7 occupation and maintenance of the Property, together with the fixtures and appurtenances
8 located therein, for the nuisance complained of herein, to the great and irreparable damage
9 of the public and in violation of California law.

10 **SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

11 **[Civil Code Section 3479, et seq. --**

12 **Against Defendant DORION ORLANDO MURRAY and DOES 1 through 25]**

13 32. Plaintiff incorporates by reference Paragraphs 1 through 31 of this Complaint
14 and makes them part of this Second Cause of Action as though fully set forth herein.

15 33. Since at least 2015 and continuing through the present, Defendant MURRAY
16 and DOES 1 through 25 have owned, acted as an owner, controlled, operated, managed,
17 and used, and/or directly or indirectly permitted to be occupied and used, the Property in
18 such a manner as to constitute a public nuisance in accordance with Civil Code sections
19 3479 and 3480. The public nuisance, as described herein, is injurious to health, indecent or
20 offensive to the senses, and/or an obstruction to the free use of property, so as to
21 substantially and unreasonably interfere with the comfortable enjoyment of life or property
22 by those persons living on the Property and in the surrounding community.

23 34. The public nuisance consists of, but is not limited to, narcotics activity on the
24 Property and the regular, intimidating, and disorderly presence of residents and their
25 visitors who repair dilapidated vehicles at the Property and on the street adjacent to the
26 Property resulting in chemical spills, exhaust fumes, loud power tool noise, trash, debris,
27 lack of parking in the community, and blocked driveways of other properties.
28

1 are otherwise appropriate, to remedy the nuisance on the Property and enhance the
2 abatement process, including but not limited to, a prohibition on Defendant DORION
3 ORLANDO MURRAY'S presence at or within 1000 feet of the Property at any time, for any
4 reason; evicting any residents involved in narcotics activity or violent crime; prohibiting
5 known narcotics users and dealers from accessing the Property; and strict limitations on
6 who else may be present on the Property at all times.

7 5. That as part of the Judgment, an Order of Abatement be issued, and that the
8 Property be closed for a period of one year, not to be used for any purpose, and be under
9 the control and custody of this Court for said period of time; or, in the alternative, if the
10 Court deems such closure to be unduly harmful to the community, that Defendant DORION
11 ORLANDO MURRAY, and DOES 1 through 25, pay an amount of damages equal to the
12 fair market rental value of the Property for one year to the City or County in whose
13 jurisdiction the nuisance is located in accordance with Health and Safety Code section
14 11581 subdivision (c)(1).

15 6. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25,
16 each be assessed a civil penalty in an amount not to exceed twenty-five thousand dollars
17 (\$25,000.00).

18 7. That all fixtures and moveable property used in conducting, maintaining, aiding
19 or abetting the nuisance at the Property be removed by the LAPD and sold in the manner
20 provided for the sale of chattels under execution. Said fixtures and property shall be
21 inventoried and a list prepared and filed with this Court.

22 8. That there shall be excepted from said sale, such property to which title is
23 established in some third party not a defendant, nor agent, officer, employee or servant of
24 any defendant in this proceeding.

25 9. That the proceeds from said sale be deposited with this Court for payment of
26 the fees and costs of sale. Such costs may occur in closing said property and keeping it
27 closed, removal of said property, and Plaintiff's costs in the Action, including attorneys'
28 fees, and such other costs as the Court shall deem proper.

1 10. That if the proceeds of the sale do not fully discharge all such costs, fees and
2 allowances, the Property shall also be sold under execution issued upon the order of the
3 Court or judge and the proceeds of such sale shall be applied in a like manner. That any
4 excess monies remaining after payment of approved costs shall be delivered to the owner
5 of said property. Ownership shall be established to the satisfaction of this Court.

6 11. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and
7 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs
8 and assignees, be perpetually enjoined from transferring, conveying, or encumbering any
9 portion of the Property, for consideration or otherwise, without first obtaining the Court's
10 prior approval.

11 12. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and
12 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs
13 and assignees, be ordered to immediately notify any transferees, purchasers, commercial
14 lessees, or other successors in interest to the subject Property of the existence and
15 application of any temporary restraining order, preliminary injunction, or permanent
16 injunction to all prospective transferees, purchasers, commercial lessees, or other
17 successors in interest, *before* entering into any agreement to sell, lease or transfer the
18 Property, for consideration or otherwise.

19 13. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and
20 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs
21 and assignees, be ordered to immediately give a complete, legible copy of any temporary
22 restraining order and preliminary and permanent injunctions to all prospective transferees,
23 purchasers, lessees, or other successors in interest to the Property.

24 14. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and
25 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs
26 and assignees, be ordered to immediately request and procure signatures from all
27 prospective transferees, purchasers, lessees, or other successors in interest to the subject
28 Property, which acknowledges his/her respective receipt of a complete, legible copy of any

1 temporary restraining order, preliminary and permanent injunction, at least 30 days prior to
2 the close of escrow, and deliver a copy of such acknowledgment to the Los Angeles City
3 Attorney's Office, c/o Deputy City Attorney Maria Aguillon or her designee.

4 15. That Plaintiff recover the costs of this Action, including law enforcement
5 investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed
6 \$1,000,000.00, from Defendant DORION ORLANDO MURRAY, and DOES 1 through 25.

7 AS TO THE SECOND CAUSE OF ACTION

8 1. That the Property, together with the fixtures and moveable property therein
9 and thereon, be declared a public nuisance and be permanently abated as such in
10 accordance with Civil Code section 3491.

11 2. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and
12 their agents, officers, employees and anyone acting on their behalf, and their heirs,
13 successors and assignees, be preliminarily and perpetually enjoined from operating,
14 conducting, using, occupying, or in any way permitting the use of the Property as a public
15 nuisance. Such orders may include, but not be limited to: a) an order that Defendant
16 DORION ORLANDO MURRAY, and DOES 1 through 25 permanently stay 1000 feet away
17 from the Property; b) an order prohibiting Defendant DORION ORLANDO MURRAY, DOES
18 1 through 25 and their guests at the Property from operating any unlicensed or unpermitted
19 business at the Property; c) an order prohibiting Defendant DORION ORLANDO MURRAY,
20 DOES 1 through 25 and their guests at the Property from repairing any vehicles at the
21 Property or within 500 feet of the Property; d) an order allowing Defendant DORIAN
22 ORLANDO MURRAY, DOES 1 through 25 and their guests at the Property to only park
23 their vehicles within 100 feet of the Property, and any such other orders as are appropriate
24 to remedy the nuisance on the Property and enhance the abatement process.

25 3. That Plaintiff be awarded such costs as may occur in abating said nuisance at
26 the Property and such other costs as the Court may deem just and proper.

27 4. That Plaintiff be granted such other and further relief as the Court deems just
28 and proper, including closure and/or demolition of the Property.

AS TO ALL CAUSES OF ACTION

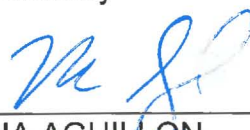
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2 1. That Plaintiff recover the amount of the filing fees and the amount of the fee
3 for the service of process or notices which would have been paid but for Government Code
4 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the
5 amount of the fees for certifying and preparing transcripts.

6 2. That Plaintiff be granted such other and further relief as the Court deems just
7 and proper.

8
9 DATED: May 16, 2019

Respectfully submitted,

10
11 MICHAEL N. FEUER, City Attorney
12 JONATHAN CRISTALL, Assistant City Attorney
13 LIORA FORMAN-ECHOLS, Asst. Superv. Deputy
14 City Attorney

15 By: 
16 _____
17 MARIA AGUILLON
18 Deputy City Attorney
19 Attorneys for Plaintiff, THE PEOPLE OF THE
20 STATE OF CALIFORNIA
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